

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF)	
VENEZUELA,)	
)	
Defendant.)	

AMBER ENERGY, INC. DISCLOSURE OF WITNESSES

Pursuant to the scheduling order entered on August 22, 2025, D.I. 2110, Amber Energy, Inc. (“Amber”) hereby gives notice that it intends to call the following witness at the Sale Hearing:

<u>Witness</u>	<u>Potential Testimony</u>	<u>Justification</u>
Michael Turkel	Amber’s August 22 bid—which the Special Master has recommended the Court adopt as the Updated Final Recommendation (D.I. 2123)—and related factual background.	Mr. Turkel’s testimony is warranted because Amber’s bid has been designated the Updated Final Recommendation, and the Sale Hearing will evaluate whether to approve Amber’s bid. Mr. Turkel will offer context to the bid in evaluating its approval.

Amber reserves all rights, including the rights to call other parties’ witnesses and to call rebuttal witnesses.

Dated: August 31, 2025

Respectfully submitted,

OF COUNSEL:

Andrew J. Rossman
Susheel Kirpalani
Matthew R. Scheck
Jonathan M. Acevedo
QUINN EMANUEL URQUHART & SULLIVAN, LLP
295 Fifth Avenue
New York, New York 10016
(212) 849-7000
susheelkirpalani@quinnemanuel.com
andrewrossman@quinnemanuel.com
matthewscheck@quinnemanuel.com

/s/ Michael A. Barlow
Michael A. Barlow (No. 3928)
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
500 Delaware Avenue, Suite 220
Wilmington, Delaware 19801
(302) 302-4000
michaelbarlow@quinnemanuel.com

Attorneys for Amber Energy Inc.

-and-

Stephen M. Baldini
Stephanie Lindemuth
Richard J. D'Amato
AKIN GUMP STRAUSS HAUER & FELD LLP
One Bryant Park
New York, New York 10036-6745
(212) 872-1000
sbaldini@akingump.com
slindemuth@akingump.com
rdamato@akingump.com

-and-

Julius Chen
AKIN GUMP STRAUSS HAUER & FELD LLP
Robert S. Strauss Tower
2001 K St NW
Washington, DC 20006-1037
(202) 887-4000
jchen@akingump.com